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Attorneys for Plaintiff *Diana Van Bree*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIANA VAN BREE,)	Case No. 2:20-cv-00788-CDS-MDC
)	
Plaintiff,)	
)	
vs.)	
)	
JT4, LLC, a Delaware Limited)	
Liability Company,)	
)	
Defendant.)	

DIANA VAN BREE,)	Case No. 2:20-cv-01038-CDS-MDC
)	
Plaintiff,)	

vs.)	STIPULATION AND REQUEST FOR EXTENSION OF TIME TO FILE RESPONSES TO DEFENDANT FRANK KENDALL III, SECRETARY, UNITED STATES AIR FORCE'S MOTION TO STAY DISCOVERY (ECF No. 95) (FIRST REQUEST)
)	
FRANK KENDALL III, SECRETARY,)	
UNITED STATES AIR FORCE,)	
Defendant.)	

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THE PARTIES, by and through their undersigned counsel of record, hereby stipulate that the Plaintiff Diana Van Bree and Defendant JT4, LLC shall have an extension of time to file responses to Defendant Frank Kendall III, Secretary, United States Air Force's Motion to Stay Discovery (ECF No. 95) from the current deadline of September 27, 2024, to and including **October 4, 2024.**

The reason for the extension is that Plaintiff's counsel has been preparing for a bench trial in a different matter before the U.S. District Court for the District of Maryland that is scheduled for October 15-16, 2024, which involves a deadline of October 1, 2024 for a Joint Pre-Trial Order and other trial-related preparation. Additionally, Plaintiff's counsel has been preparing for depositions in a separate matter originally scheduled for September 27, 2024, and September 30, 2024, but have since been rescheduled due to substantial discovery production involving more than 1,000 documents being produced late last night, September 25, 2024, which now requires counsel to perform additional discovery-related tasks for that matter. Finally, as of recent, Plaintiff's counsel is experiencing the onset of an illness that may require leave, and one of Plaintiff's counsel has been traveling and on leave this past week (week of September 23, 2024). Despite best efforts, the cumulative effect of this has resulted in delays in completing work including the response due in this case.

Additionally, JT4's undersigned counsel needs a brief extension to respond to the Motion due to unanticipated deadlines, depositions, and matters that undersigned counsel was required to cover after two attorneys unexpectedly left her office in the past two weeks. As the Office Managing Principal, JT4's counsel is responsible for supervising, managing, and covering cases and deadlines when an attorneys depart, and counsel needs an additional week to file a response to the Motion.

This is the first request to extend the deadline for Plaintiff and Defendant JT4 to file responses to Defendant United States Air Force's Motion. This stipulation for an extension of time is brought in good faith and not merely for purposes of delay.

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/ / /

Respectfully submitted this 26th day of September, 2024.

/s/James A. Hill
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IT IS SO ORDERED.



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Date: 9/30/24

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